

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

HELEN D. MARTIN, *Pro Se*
Plaintiff

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C.A. No.: 06-303 (GMS)

PACHULSKI, STANG, ZIEHL,
YOUNG & JONES, P.C.,
Defendant

MANDATORY DISCLOSURES BY DEFENDANT
PURSUANT TO FED. R. CIV. P. 26(a)

NOW COMES Defendant, by and through counsel, pursuant to Fed. R. Civ. P. 26(a), which reserves the right to supplement this information and states:

1. A. Individuals likely to have discoverable information that may be used to support Defendant's claims or defenses, unless solely for impeachment. In addition to the defendant:

Answer

Karen Sheeler c/o PACHULSKI, STANG, ZIEHL, YOUNG & JONES, P.C.

Donna J. Carr c/o PACHULSKI, STANG, ZIEHL, YOUNG & JONES, P.C.

Laura Davis Jones, Esquire c/o PACHULSKI, STANG, ZIEHL, YOUNG & JONES

B. A description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of Defendant and that Defendant may use to support his claims or defenses, unless solely for impeachment.

Answer

No cause finding of DDOL

Payroll and personnel records of Plaintiff.

Salary history and records of employees establishing no discrimination.

Employee Handbook and Acknowledgment Form signed by Plaintiff.

C. A computation of damages claimed.

Answer

Not applicable since Plaintiff is not entitled to damages.

D. Any insurance agreement which may be available to satisfy part or all of a judgment which may be entered in the action.

Answer

Objected to as not likely to lead to discovery of admissible evidence since existence of any insurance is not relevant until a judgement is obtained.

2. A. The disclosure of any person who may be used at trial to present evidence.

Answer

Objected to as premature and work product. Trial witnesses will be disclosed in accordance with any Pretrial Order.

Respectfully submitted,
RICHARD R. WIER, JR., P.A.

/s/ Richard R. Wier, Jr.
Richard R. Wier, Jr. (#716)
Two Mill Road, Suite 200
Wilmington, DE 19806
(302)888-3222

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HELEN D. MARTIN, *Pro Se*
Plaintiff

v.

PACHULSKI, STANG, ZIEHL,
YOUNG & JONES, P.C.,
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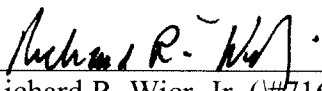
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CERTIFICATE OF SERVICE

I certify that on this 6th day of December 2006, I electronically filed the attached document with the Clerk using CM/ECF and two copies of the attached document have been served BY FIRST CLASS MAIL on:

Helen D. Martin, *pro se*
616 W. 8th Street
Wilmington, DE 19801

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Attorney for Defendant

DATED: December 6, 2006